



# Canadian Grain Act Review

Response Submitted by: Canadian Celiac Association (CCA)

April 29, 2021

Respectfully Submitted to: Canadian Grain Commission

By email: [aafc.cgareview.aac@canada.ca](mailto:aafc.cgareview.aac@canada.ca)

To Whom it May Concern,

The Canadian Celiac Association (CCA) is pleased to respond to the public and stakeholder consultation regarding the **Canadian Grain Act** Review.

Thank you for the opportunity to make a submission to support Canada's desire to "collectively shape a vision for a world-class grain quality assurance system and producer protection framework that meets the needs of the sector, now and for the future." This system grows and delivers grains that ends up on the plates of Canadians.. As a key consumer stakeholder, the CCA is pleased to provide a voice to individuals seeking safe gluten-free grains from farm to fork.

CCA, a national charity that has been operating for nearly 50 years, advocates, educates and invests in research for people with celiac disease (CD) and gluten-related disorders. Celiac disease is a genetic autoimmune disorder that affects 1 in 100 Canadians. When an individual with celiac disease consumes gluten (found in wheat, rye, barley and triticale), it triggers an autoimmune response damaging the small intestine. This causes a wide range of gastrointestinal and extra-intestinal symptoms. Continued exposure to gluten, can lead to long-term complications such as osteoporosis, anemia, neurological conditions, infertility and cancer. The only treatment for celiac disease is a strict life-long gluten-free diet.

People with celiac disease, like all Canadians, require excellent sources of natural fibre and protein in their diet to maintain good health. Because they cannot consume gluten-containing grains, safe alternative high-fibre sources such as oats, pulses, flax, hemp and other gluten-free grains are excellent options for people with celiac disease and gluten-related disorders.

Unfortunately, oats and other inherently gluten-free grains, pulses, flax and hemp are frequently cross-contaminated with gluten-containing grains (especially wheat and barley). This is because they are often grown in rotation and/or alongside gluten-containing grains. Additionally, shared equipment for seeding, harvest, storage, transportation and processing is utilized.

CCA was pleased to collaborate for many years with the renowned late agri-scientist, Dr. Vernon Burrows, to help identify and develop a "Purity Protocol" process for safe gluten-free oats in Canada.

Thus, the CCA is keenly interested in ensuring that the growing, storage, transportation and processing of a wide variety of gluten-free grains in Canada will result in greater access to safe, gluten-free food for Canadians. CCA previously received a multi-year Growing Forward 2 grant from Agriculture Canada and Agri-Food Canada to evaluate and improve agronomic production of safe gluten-free grains. The study investigated how sample preparation and sampling methods can reduce variability when testing gluten in non-gluten containing grains

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(NGCG) including oats, pulses and oilseeds (flax and hemp). The findings of this study are found at <https://www.celiac.ca/aafc/>. Further research in this area would advance and ensure a safer gluten-free grain supply for millers and manufacturers.

CCA would like to offer comments on the following areas of the **Canadian Grain Act** Review as it relates to Canadian gluten-free consumers:

#### **Section 4.5**

CCA is most concerned about the quality of grains and pulses that are shipped to millers and producers of various foods and supplements (e.g. pulses, pulses flours, oats, oat flours and other ingredients derived from these grains and pulses that are used in food and supplements) that meet Health Canada standards for food allergen and gluten labelling. Health Canada's gluten-free standard for food products is set at the threshold of less than 20 ppm gluten.

The Canadian Grain Commission (CGC) needs to understand emerging science that:

- A growing number of people are being diagnosed with food allergies and gluten-related disorders, including celiac disease, and these individuals require grains and pulses that are free of the allergens and gluten proteins.
- Food manufacturers require cleaner grain and pulse products than what the current CGC standards are for foreign grains in various crops delivered to elevators. The current level of gluten contamination from wheat, rye, barley or triticale in grains/pulses (e.g., oats, buckwheat, quinoa, pulses, etc.) is threatens the health of Canadians with allergies and celiac disease.
- There is a need for more research into how grains and pulses are being grown, harvested, transported and levels of contamination occurring in elevators and railcars.
- CGC needs to objectively look at testing of inherently gluten-free grains and pulses being processed by various millers and producers. It is strongly recommended that an independent study be funded through an accredited research institution.
- Canada has the opportunity to lead the world and increase market share in producing safe gluten-free grains which is increasing in demand all over the globe.

We would welcome the chance to further discuss these issues with the Minister and the Ministry.

Sincerely,

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